



Military Leave Policy

Policy Summary

Newell Brands, Inc. and its subsidiaries (the "Company") supports the efforts of employees who serve in the United States military and other uniformed services. This Policy provides guidance regarding Military Leave at the Company and compliance with the federal Uniformed Services Employment and Reemployment Act ("USERRA"). Some state laws may provide additional military leave rights. Nothing in this Policy is intended to supersede state laws that may provide additional or greater benefits or rights than provided for in this Policy.

Eligibility

All U.S. employees who must be absent from work due to service in the uniformed services (as defined below), including employees seeking to return to work after completing service in the uniformed services.

Policy Specifics

1. **Taking Leave.** You must inform your supervisor and your Human Resources ("HR") representative of your need to take Military Leave as soon as possible so that appropriate payroll and benefit arrangements can be made. You should submit copies of any orders to your HR representative and make arrangements to submit military pay vouchers.
2. **Entitlements During Leave.**

Pay. If you participate in mandatory annual Reserve or National Guard training, you are eligible for paid Military Leave of up to 2 weeks. If you are eligible for paid Military Leave, you will receive the difference between the base pay (grade and length of service) you receive from the government for your training and your regular base pay with the Company. Shift differentials will be included in military leave pay, but other forms of premium pay and overtime will not affect military leave pay. Subsistence, rental and travel allowances are not included when determining your government base pay received for your training. If an employee who is a member of the Reserves or National Guard is called to active duty to serve in a war, military conflict, or in support of such efforts, this paid Military Leave period will be extended for the length of such service or 1 year, whichever occurs first.

Vacation. You may elect to take accrued, unused vacation during your Military Leave. If you elect to take accrued, unused vacation during your Military Leave, you will receive vacation pay up to the amount of accrued vacation that you have available for that period.

You will cease to accrue vacation after 60 days of continuous leave.

Medical Benefits. You may elect as an eligible employee to continue coverage under the Company's group health plan during the period of service. If you elect continuation coverage, coverage under the plan may continue for you and your dependents for up to 24 months from the date that your service-related absence begins. If you elect to continue your coverage, you will be responsible for paying 102% of the applicable premium (your share + the Company's share + 2% administrative cost), unless your period of service is 30 days or less. If your period of service is 30 days or less and you elect to continue coverage, you will be responsible for paying only the employee share of your premium.

3. **Reporting Back to Work and Reemployment Rights.** In order to maintain the right to reemployment, your cumulative Military Leave generally may not exceed 5 years. When reporting back to work at the end of Military Leave, keep the following guidelines in mind.



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If your period of service was 30 days or less: You must report back to work on the first working day after the completion of your service, allowing for appropriate travel time and an 8-hour rest period.

If your period of service was 31 to 180 days: You must inform the Company of your intention to resume employment within 14 days of completion of your service.

If your period of service was 181 days or more: You must inform the Company of your intention to resume employment within 90 days of completion of your service.

If your period of service exceeds 30 days, you also must provide the Company with documentation that shows your application for reemployment is timely, your service has not exceeded a total of 5 years, and your service ended under honorable circumstances. The time between your completion of service and reporting back to work with the Company is unpaid.

Upon return from service, the Company will generally place you in the position you would have attained if continuously employed by the Company, provided you are qualified for the position and your length of service was 90 days or less. If your length of service was more than 90 days, you may be placed in the position you would have attained if continuously employed or a comparable position, at the Company's sole discretion. Regardless of the length of your service, the Company will engage in reasonable efforts to help you qualify for the appropriate position upon your return.

Reemployment rights only apply to employees who are released from service under honorable circumstances. You will retain your seniority and corresponding rights and benefits when reemployed.

Any employee who fraudulently requests or obtains Military Leave, or who submits fraudulent documentation to have such an absence excused is subject to disciplinary action, up to and including termination.

Key Terms and Definitions:

Term	Definition
Uniformed services	U.S. Armed Forces (Army, Navy, Air Force, Marine Corps, Coast Guard, Space Guard, and Public Health Service commissioned corps) and their Reserve components, the Army National Guard and the Air National Guard.
Service	Voluntary or involuntary active duty, active duty for training, inactive duty training, full-time National Guard duty, absence for examination for fitness for duty, funeral honors duty

Process for Exceptions

The Company expects no exceptions will be needed to the Military Leave Policy. Exceptions to this Policy will only be considered in extreme and exceptional cases. A request for an exception should be documented in writing and state a reasonable, justifiable and legitimate business need. Such request for an exception should be made to your Vice President of Human Resources. Routine exception requests are discouraged.



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Corrective Action for Non-Compliance

Failure to comply may include corrective action and enforcement subject to local legal requirements.

Questions about this Policy should be directed to your HR Representative.

The Company's intent is to comply with all controlling federal, state, and local laws, rules, regulations and ordinances. If any portion of this Policy conflicts with any such law, the controlling law applies. The Company may modify, revise, amend or delete its policies and procedures in whole or in part, with or without notice, as it deems necessary or appropriate and/or to comply with changes in the law. This Policy is not intended, nor should it be construed, as a guarantee or promise of employment for any specific length of time, or to create a contract of employment or other contractual rights.

Effective Date: January 1, 2021; previous effective date January 1, 2018

Policy Owner: Total Rewards

Executive Sponsor: Chief Human Resources Officer